

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

JOHN HANCOCK LIFE INSURANCE  
COMPANY,

Plaintiff,

V.

VESTMONT LIMITED PARTNERSHIP,  
et al.,

Defendants.

Civil Action No. 05-11614 WGY

## DEFENDANTS' PROPOSED VOIR DIRE QUESTIONS FOR THE JURY PANEL

The defendants propose the following specific jury questions for the jury to be empanelled in this matter on Monday, May 1, 2006.

Defendants anticipate that the Court will ask the questions generally put to the panel concerning whether the potential jurors are familiar with the parties or counsel. The following are intended to be supplemental questions relating to the parties and issues in this case.

1. Do you or does any member of your family hold insurance policies from John Hancock?
2. Do you or does any member of your family have investment products managed by John Hancock, such as mutual funds, 401(k) plans, 529 plans, fixed or variable annuity products?
3. If your answer to either of the two prior questions is “yes”, would this affect your ability to render an impartial verdict in a lawsuit involving a claim asserted by John Hancock and a counterclaim against John Hancock?

4. Do you or does any member of your family hold insurance policies from Manulife Financial, the parent company of John Hancock?

5. Do you or does any member of your family have investment products managed by Manulife Financial, such as mutual funds, 401(k) plans, 529 plans, fixed or variable annuity products?

6. If your answer to either of the two prior questions is “yes”, would this affect your ability to render an impartial verdict in a lawsuit involving a claim asserted by John Hancock and a counterclaim against John Hancock?

7. Do you or any member of your family work in a bank or for any other entity engaged in the area of commercial lending?

8. Have you ever been a party to a lawsuit involving a loan?

VESTMONT LIMITED PARTNERSHIP,  
VESTMONT LIMITED PARTNERSHIP II,  
VESTMONT LIMITED PARTNERSHIP III, and  
VESTERRA CORPORATION d/b/a  
MONTGOMERY SQUARE PARTNERSHIP

By their attorneys,

/s/ *Robert D. Hillman*

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document  
was served upon the attorney of record for each party by  
***electronic filing*** on this date.

/s/ *Robert D. Hillman*

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